

EXHIBIT A-3

November 21, 2002

W.R. Grace

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 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/10/02	JD	Review documents for responsiveness to discovery requests and privilege (1.50).	1.50	390.00
10/10/02	EES	Trial team strategy meeting for purposes of coordinating work assignments (1.00); review Wiley Wright deposition testimony (3.90); extensive telephone conference with accounting expert re Wiley Wright documentation and expert report issues (1.40); draft proposed findings of fact (2.80).	9.10	2,548.00
10/10/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	10.00	2,600.00
10/10/02	GMB	Lexis research re removal action/remedial action distinction; review cases (2.00); review cases re removal action/remedial action distinction (1.80).	3.80	836.00
10/10/02	LAC	Review, categorize and code documents produced by EPA for relevance to various case issues.	3.10	697.50
10/10/02	SCC	Review documents for responsiveness to discovery requests and privilege (0.60).	0.60	141.00
10/10/02	ATC	Conference with cost recovery team (1.00); review documents for responsiveness to discovery requests and privilege (5.1).	6.10	1,067.50
10/10/02	MFC	Attend training session on working with Lotus Notes and re document review/coding issues (1.00) (N/C).	0.00	0.00
10/10/02	JAH	Attend strategy meeting (1.00); conference with JDMcCarthy re ATSDR findings of fact and conclusions of law (.50).	1.50	330.00
10/10/02	MHH	Review documents for responsiveness to discovery requests and privilege.	8.80	1,540.00

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Date	Tkpr Task	Description	Hours	Value
10/10/02	BCH	Review, categorize, and code documents for various case issues.	1.00	250.00
10/10/02	KAT	Review documents for responsiveness to discovery requests and privilege (2.50).	2.50	462.50
10/10/02	SBY	Review documents for responsiveness to discovery requests and privilege (4.30).	4.30	1,075.00
10/10/02	NKA	Review, categorize and code documents to be produced to EPA for relevances to document request issues (5.00); Manage and provide assistance to temporary employees and HRO employees re document review/coding issues (2.50); Attend Grace cost recovery team meeting re trial schedule, deadlines, and priorities (1.00); Office meeting with KJCoggon, JLSherman, and AECarroll re outstanding discovery issues (.30).	8.80	968.00
10/10/02	AEC	Trial team meeting re upcoming deadlines and strategy (1.00); update deposition exhibit tracking chart and notebooks, and update database to reflect previously marked exhibits (1.8); review, categorize and code documents produced by EPA for relevance to various case issues (1.5); review and compile sampling documents for R. Lee direct testimony (3.2).	7.50	937.50
10/10/02	KLK	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites (6.50).	6.50	812.50
10/10/02	JLS	Cost recovery team meeting re status of various deadlines and case issues (1.00); conferences with CCotts, NKABerle, AECarroll and KJCoggon re privilege logs (1.30); conference with CLNeitzel re deposition transcripts for Dori Kuchinsky and database research re same (0.60); review, categorize and code document for various case issues (3.40).	6.30	787.50

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Date	Tkpr Task	Description	Hours	Value
10/10/02	JMH	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites.	7.80	1,092.00
10/10/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
10/10/02	MBF	Review, categorize and code problem work-product/medical confidential documents to be produced to EPA for relevance to various case issues (3.60).	3.60	324.00
10/10/02	ICM	Conduct case law research for Motion in Opposition to Exclude the Expert Testimony of Dale Jensen and Motion in Opposition to Summary Judgement (4.20); conduct case law research and research citations to support specific fact statements in Statement of Material Facts re Cost recovery (2.80).	7.00	770.00
10/11/02	LB	Prepare for and meeting with Alan Stringer and Jim Stout, including site tour (5.00); travel to Libby from Kalispell (1.00) (N/C 1.00) (NWT 50%); travel from Libby to Denver (2.80) (N/C 2.80) (NWT 50%); telephone conferences with KJCoggon re site information and case issues (.40).	9.20	3,680.00
10/11/02	CGH	Conferences re administrative record briefs and citations needed for reply on depositions, review of same (1.80); review of documents, deposition transcripts in preparation for brief drafting and draft reply brief on Peronard and Weis (3.50).	5.30	1,855.00
10/11/02	KWL	Telephone conference with KJCoggon re motions, discovery issues, and schedule (.50); review EPA documents re Max Dodson and Marianne Horinko for purposes of developing trial cross-examination (1.20); telephone conference with KJCoggon re coordinating responses to US' motions (.30).	2.00	700.00

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Date	Tkpr Task	Description	Hours	Value
10/11/02	LSD	Continue reviewing motion for summary judgment, including statement of facts for purposes of developing response (2.50).	2.50	750.00
10/11/02	KJC	Address inquiries and issues re document databases (0.40); review and respond to e-mail and questions re document review and coding (1.20); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.20); follow up on document production from EPA (0.40); respond to questions from client and team re facts and documents (0.30); telephone conference with KWLund re U.S. motions, discovery issues and schedule (0.50); telephone conference with W. Corcoran re motions and related issues (0.30); address trial logistics re computers, staffing, space and software (1.40); address issues re production to EPA (1.80); review and respond to emails re responses to motions for summary judgment (2.30); telephone conference with R. Marriam re EPA decisions (0.10); telephone conferences with LBrown re site visit, timeline and motions (0.40); telephone conference with KLKinnear re timeline (0.30); draft e-mail re timeline (0.20); conference with MJOchs re motion to exclude R. Lee (0.20).	10.00	2,750.00
10/11/02	JD	Review documents for responsiveness to discovery requests and privilege (5.70).	5.70	1,482.00
10/11/02	EES	Complete review of Wiley Wright's deposition testimony (1.60); draft proposed findings of fact for cost issues (4.80); begin review of Timothy Wall's (CDM) deposition testimony (1.10).	7.50	2,100.00
10/11/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00

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Date	Tkpr Task	Description	Hours	Value
10/11/02	GMB	Lexis research re remedy for exceptions to review limited to administrative record (3.50); review cases re remedy for exceptions to review limited to administrative record (2.80).	6.30	1,386.00
10/11/02	LAC	Review, categorize and code documents produced by EPA for relevance to various case issues.	4.00	900.00
10/11/02	ATC	Research re de novo review of administrative record for GMBarry and conclusions of law (6.4).	6.40	1,120.00
10/11/02	JAH	Consider and perform legal research re removal issues (9.20); conference with GMBarry re same (1.00).	10.20	2,244.00
10/11/02	MHH	Review documents for responsiveness to discovery requests and privilege.	7.70	1,347.50
10/11/02	KAT	Review documents for responsiveness to discovery requests and privilege (1.00).	1.00	185.00
10/11/02	SBY	Review documents for responsiveness to discovery requests and privilege (9.10).	9.10	2,275.00
10/11/02	NKA	Review, categorize and code documents to be produced to EPA for relevances to document request issues (3.80); Manage and provide substantive review re document coding issues (2.10);	5.90	649.00
10/11/02	AEC	Review and compile supplemental production documents for potential use by our experts (3.8); review, categorize and code documents produced by EPA for relevance to various case issues (4.5).	8.30	1,037.50
10/11/02	AH	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.50	750.00
10/11/02	KLK	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites (8.00).	8.00	1,000.00

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Date	Tkpr Task	Description	Hours	Value
10/11/02	JLS	Research for Motion for Summary Judgment re residential properties listed in Statement of Uncontroverted Facts including review of Weis, Peronard, Stringer and Owens depositions (4.20); review categorize and code documents for various case issues (2.80).	7.00	875.00
10/11/02	PRS	Conference with KJCoggon re organization of Libby, Cost Recovery and other Grace files (0.60); conference with T. Johnson re same (0.60).	1.20	150.00
10/11/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
10/11/02	MBF	Review, categorize and code documents produced by EPA for relevance to various case issues (2.70); obtain cases cited in government brief at request of LSDecker (2.00).	4.70	423.00
10/12/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.30	678.50
10/12/02	EES	Complete review of Day 1 of Timothy Wall's deposition testimony (2.30); review Day 2 of Timothy Wall's deposition testimony (2.90); begin review of Day 2 of John McGuiggan's deposition testimony (1.60).	6.80	1,904.00
10/12/02	JAH	Receive and evaluate US' motion for partial summary judgment on third defense (.50); consider and review legal research re removal issues (7.50).	8.00	1,760.00
10/12/02	MHH	Review documents for responsiveness to discovery requests and privilege.	1.80	315.00
10/12/02	NKA	Update cost recovery coding spreadsheet with contents of images from cd PMT_029 (1.70).	1.70	187.00
10/13/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	2,360.00

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Date	Tkpr Task	Description	Hours	Value
10/13/02	JAH	Consider and review legal research re removal issues and prepare outline of same.	7.00	1,540.00
10/13/02	MJO	Review Motion in Limine to Strike Portions of Proposed Testimony of Dr. Richard Lee as filed by EPA (with Exhibits) (.30); review deposition of Dr. Lee (1.50); retrieve and review case law cited by EPA and case law in response (Lexis) (3.20).	5.00	900.00
10/14/02	LB	Meeting with Rich Bartelt, Frank Jones, and KJCoggon (and for part also with Dale Jensen, Kurt Fessler, and EEStevenson) re preparation for testimony (7.20); conference with KJCoggon re schedule for preparation of Hughson, Chatfield, and follow up with Lee and Stringer (.30); e-mail exchange with KWLund and then conference call with KWLund and KJCoggon re November client strategy meeting (.10); office conference with CLNeitzel re findings of fact re non-cancer end points and Hughson trial preparation schedule (.50); review first draft of reply re Weis and Peronard deposition continuation and brief conference with ATCrist re same (.20).	8.30	3,320.00
10/14/02	CGH	Review of draft brief and assemble research re same in preparation for filing (.20).	0.20	70.00
10/14/02	KWL	Review deposition transcript of Harry Eschenbach for purposes of developing trial testimony (1.50); review deposition transcripts for Meeker and Millette for purpose of coordinating trial testimony (4.50).	6.00	2,100.00
10/14/02	JDM	Telephone conference with CLNeitzel re non-cancer findings of fact (0.2); telephone conference with CLNeitzel re deposition testimony as it relates to findings of fact (0.2).	0.40	120.00

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Date	Tkpr Task	Description	Hours	Value
10/14/02	CLN	Review of information re liability brief (.30); review and revise findings of fact re non-pleural endpoints (2.70); memo to file re Hughson deposition (.20); review and revise Eschenbach deposition (.30); memo to file re Eschenbach deposition (1.0); review U.S. motions filed on Friday (1.0); conference with LBrown re findings of fact (.30); review and revise findings of fact (2.80); conference with H. Eschenbach (.20).	8.80	2,640.00
10/14/02	LSD	Respond to e-mail from KJCoggon re Motion for Summary Judgment and Stipulations (.20); review further documents in preparation for responding to Motion for Summary Judgment re liability and telephone conference with JLSherman re her review of pertinent deposition transcripts (.70).	0.90	270.00
10/14/02	KJC	Address inquiries and issues re document databases (0.20); review and respond to e-mail and questions re document review and coding (0.30); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.20); respond to questions from client and team re facts and documents (0.40); telephone conference with G. Graham re trial logistics, options re getting the Court to respond, and various pending motions (1.20); conference with R. Bartelt, LBrown and F. Johns re trial testimony (5.40); conference with R. Bartelt, D. Jensen et al re trial testimony coordination (1.20); conferences with LBrown re expert trial testimony, reply brief, schedule and staffing (0.70).	9.60	2,640.00
10/14/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues.	0.80	236.00

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Date	Tkpr Task	Description	Hours	Value
10/14/02	EES	Review EPA's brief in support of their motion for summary judgment (3.40); draft outline of response to EPA's summary judgment motion (2.80); meet with accounting experts, cost experts, LBrown and KJCoggon re cost issues/trial strategy (1.20); review case authority for use in opposition to the government's summary judgment motion (3.20).	10.60	2,968.00
10/14/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00
10/14/02	GMB	Meeting with JAHall re Motion for Summary Judgement brief (.70); Lexis research re "arbitrary and capricious" issues for Motion for Summary Judgement brief (2.30); review Lexis research cases re same (2.80).	5.80	1,276.00
10/14/02	LAC	Review, categorize and code documents produced by EPA for relevance to various case issues.	5.70	1,282.50
10/14/02	ATC	Cite check and edit reply to U.S. opposition re deposition time limits (4.8); meet with JAHall re response to motion for summary judgement re third affirmative defense (0.5); review motion and preliminary motions (1.5).	6.80	1,190.00
10/14/02	JAH	Review legal research for response to motion for summary judgment-third defense and prepare summaries of same (5.50); telephone conference with GMBarry re preparation of response to motion for summary judgment-third defense (.70); conference with MBFloyd re top EPA NPL sites (.20); review research regarding same (.30); conference with ATCrist re response to motion for summary judgment-third defense (.50).	7.20	1,584.00
10/14/02	MHH	Review documents for responsiveness to discovery requests and privilege.	4.90	857.50
10/14/02	BCH	Review, categorize, and code documents for various case issues.	3.50	875.00

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Date	Tkpr Task	Description	Hours	Value
10/14/02	DPK	Review and comment on government briefs (1.0); research summary judgment standards (1.0).	2.00	480.00
10/14/02	MJO	Begin draft response to Motion in Limine re Dr. Lee.	3.30	594.00
10/14/02	NKA	Manage and provide assistance to temporary employees and HRO personnel regarding document coding/review issues (1.00); Update coding assignment spreadsheets with new material in WRG 10 million series and Production database (.70); Phone conferences with expert and AECarroll re cd's still to be provided for review (.20); Review and revise privilege log for Alan Stringer paper documents and e-mail files (5.40).	7.30	803.00
10/14/02	AEC	Review supplemental production documents for potential use by our experts (5.2); update deposition exhibit tracking chart and notebooks, and update database to reflect previously marked exhibits (1.5).	6.70	837.50
10/14/02	AH	Review, categorize and code documents produced by EPA for relevance to various case issues.	6.10	610.00
10/14/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (8.00).	8.00	1,000.00
10/14/02	JLS	Research re liability for Motion for Summary Judgment including review of expert depositions (2.40); conference with AHerceglie re database research (0.30); load Brody deposition in Livenote and send to client (0.30) (N/C); database research for LBrown re Libby property values (0.90); review categorize and code documents for various case issues (1.20).	4.80	600.00
10/14/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00

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Date	Tkpr Task	Description	Hours	Value
10/14/02	MBF	Research and obtain EPA guidance documents for KJCoggon (1.50); research on five most contaminated NPL sites for JAHall (1.50).	3.00	270.00
10/14/02	ICM	Review and analyze issues in summary judgement motions as per EEStevenson's request.	3.20	352.00
10/15/02	LB	Conference with KJCoggon re priorities, schedule and case facts (0.80).	0.80	320.00
10/15/02	KWL	Review United States motions for Summary Judgement and Motions to Exclude for purpose of formulating strategic response (3.0); review final proposed stipulation on liability issues for purpose of considering additional proposed stipulations (1.40).	4.40	1,540.00
10/15/02	JDM	Review Middleton deposition in preparation for draft findings of fact (3.3); outline findings of fact re case series (1.7).	5.00	1,500.00
10/15/02	CLN	Review of Dahl expert report (.50); review of documents re non-cancer endpoints in connection with findings of fact and conference with Rick Reiss re same (3.30); review of asbestos documents for findings of fact in preparation for call with Rick Reiss (1.0); review of pleural plaques documents in preparation for call with Rick Reiss (1.0); telephone conference with Rick Reiss and Jay Turim re trial preparation issues (.80).	6.60	1,980.00
10/15/02	LSD	Coordinate with JAD'Alessandro re additional research issues (.30); office conference with JLSherman re findings of fact relating to Motion for Summary Judgment (.50); continue reviewing Statement of Fact and brief in support of Motion in preparation for responding to same (2.0).	2.80	840.00
10/15/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (6.10).	6.10	1,677.50

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Date	Tkpr Task	Description	Hours	Value
10/15/02	KJC	Draft, review and edit findings of fact and conclusions of law (0.30); draft direct examination questions (0.10); address billing issues from team, vendors and experts (0.40); address inquiries and issues re document databases (0.50); review and respond to e-mail and questions re document review and coding (0.60); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.30); respond to questions from client and team re facts and documents (0.20); address EPA motion in limine re R. Lee (2.40); telephone conference with A. Stringer re trial testimony (0.20); research re EPA decisions on asbestos (0.30); conference with LBrown re priorities, schedule and case facts (0.80); telephone conference with EEStevenson re schedule for responding to motion for summary judgment and motion in limine (0.30); address trial logistics (0.70); review A. Stringer documents for responsiveness and privilege (1.20); research EPA data (0.70); review EPA admissions (0.40).	9.40	2,585.00
10/15/02	JD	Conference with LSDecker re response to summary judgment motion on liability (0.30); review emails re summary judgment issues (0.20).	0.50	130.00
10/15/02	EES	Draft indirect cost portion of the findings of fact (3.80); review additional case authority re opposition to summary judgment motion (2.20); review analysis opposing the government's motion to exclude Dale Jensen's testimony (2.70); meet with accounting experts re findings of fact, cost opinion updates/revisions, and summary judgment issues (3.10).	11.80	3,304.00
10/15/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	2,080.00
10/15/02	ER	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.00	350.00

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Date	Tkpr Task	Description	Hours	Value
10/15/02	GMB	Review of exhibits to DOJ's Motion for Summary Judgement (4.10).	4.10	902.00
10/15/02	ATC	Research re response to motion for summary judgment re third affirmative defense (4.60); conference with JAHall re organization of response (1.20).	5.80	1,015.00
10/15/02	MFC	Review, categorize and code documents produced by EPA for relevance to various case issues (4.50) (N/C).	0.00	0.00
10/15/02	JAH	Conference with ATCrist re research and strategy for response to motion for summary judgment-third defense.	1.20	264.00
10/15/02	MHH	Review documents for responsiveness to discovery requests and privilege.	3.00	525.00
10/15/02	BCH	Review, categorize, and code documents for various case issues.	9.00	2,250.00
10/15/02	DPK	Research statutes and case law re CERCLA standards for response costs recovery and re admission of expert testimony (3.0); review and comment on government briefs on motion for summary judgment and motion in limine to exclude expert testimony and conference with HRO personnel re same (3.0); review and comment on expert reports (2.0).	8.00	1,920.00
10/15/02	MJO	Begin draft of response to Motion in Limine re Dr. Lee (3.80); review pleadings and ruling from Barbanti v. Grace in Washington State re challenge to Dr. Lee's testimony (1.00).	4.80	864.00

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Date	Tkpr Task	Description	Hours	Value
10/15/02	NKA	Continue to draft privilege log for Alan Stringer material in WRG 10 million series (5.30); Manage and provide assistance to temporary employees and HRO personnel re document review/coding issues (2.00); Search for and locate "clean" copies of three Action Memoranda as requested by expert (.80); Search for and locate response document per EESTevenson's request, and provide same to DPKunstle and ICMulholland (.70).	8.80	968.00
10/15/02	AEC	Review and transmit supplemental production documents for potential use by our experts (2.7).	2.70	337.50
10/15/02	AH	Review and organize W.R. Grace case file (N/C).	0.00	0.00
10/15/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (10.50).	10.50	1,312.50
10/15/02	JLS	Review categorize and code documents for various case issues (2.80); research re liability for Motion for Summary Judgment including database research (3.10); conferences with CCotts re EPA Production/Cost Recovery database (1.20).	7.10	887.50
10/15/02	JMH	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites (2.00).	2.00	280.00
10/15/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
10/15/02	MBF	Research EPA website for guidance documents on removal actions (.20); call EPA Superfund hotline re same (.10); review, categorize and code documents produced by EPA for relevance to various case issues (.40); research caselaw regarding section 9601(35)(C) for LSDecker (2.80).	3.50	315.00

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Date	Tkpr Task	Description	Hours	Value
10/15/02	ICM	Conduct research on several legal issues to develop motions in response to DOJ motions to exclude experts and request for summary judgment.	8.00	880.00
10/16/02	KWL	Review various emails re responses to United States Summary Judgment motions (.60); telephone conference with Bill Corcoran re case status and strategy (.40); review draft findings of fact and conclusions of law for purposes of developing consistent trial strategy (2.70).	3.70	1,295.00
10/16/02	JDM	Draft findings of fact re Middleton.	1.00	300.00
10/16/02	CLN	Conference with B.Hughson re deposition (.50); review and revise Eschenbach deposition changes (.20); review Hughson changes (.30).	1.00	300.00
10/16/02	LSD	Office conference with KJCoggon re facts and strategies related to responding to Motion for Summary Judgment on liability (1.0); follow up on issues discussed as well as further review of information and brief from plaintiff (1.20).	2.20	660.00
10/16/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (1.80).	1.80	495.00

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Date	Tkpr Task	Description	Hours	Value
10/16/02	KJC	Draft direct examination questions (1.30); address billing issues from team, vendors and experts (0.30); review and respond to e-mail and questions re document review and coding (0.10); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.60); review and respond to e-mail and follow up on document production from EPA (0.30); respond to questions from client and team re facts and documents (0.10); conference with LSDecker re opposition to Motion for Summary Judgment re liability (1.10); research re opposition to Motion for Summary Judgment re liability (0.40); telephone conference with R. Lee re trial testimony (2.00); review and revise opposition to motion in limine (0.50); review, research and revise privilege log (0.50); conference with AHerceglie and TTJohnson re case status, documents and depositions (0.40); conference with GMBarry re progress on response to Motion for Summary Judgment (0.20); conference with EEStevenson re progress on response to Motion for Summary Judgment and motion in limine, findings of fact and new Jensen cost schedule (0.40).	8.20	2,255.00
10/16/02	JD	Review KDC's response to government motion for partial summary judgment on liability issue (2.00); research re passive migration theory (3.30).	5.30	1,378.00
10/16/02	EES	Revise and expand the findings of fact re direct cost documentation issues and annual allocation cost issues (4.90); extended phone conference with accounting expert re cost findings of fact issues (1.40); review documentation issues raised by Wiley Wright's new cost opinions (.80); expand Daubert brief analysis opposing the exclusion of Dale Jensen's expert testimony (2.70).	9.80	2,744.00
10/16/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00

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10/16/02	GMB	Review of previous filings dealing with lack of evidentiary support in administrative record, Bartelt report and conclusions (6.50).	6.50	1,430.00
10/16/02	ATC	Research and draft chart re response to motion for summary judgment on third affirmative defense.	6.40	1,120.00
10/16/02	MFC	Review, categorize and code documents produced by EPA for relevance to various case issues (2.80) (N/C).	0.00	0.00
10/16/02	JAH	Review of legal research re motion for summary judgment-third defense and preparation of response re same.	2.00	440.00
10/16/02	MHH	Review documents for responsiveness to discovery requests and privilege.	2.20	385.00
10/16/02	BCH	Review, categorize, and code documents for various case issues.	8.50	2,125.00
10/16/02	DPK	Research and summarize case law for summary judgment brief re response costs (1.0); draft outline of summary judgment brief (0.8); conference with HRO personnel re same (0.5).	2.30	552.00
10/16/02	MJO	Continue draft of response to Motion in Limine re Dr. Lee (3.50); draft Affidavit of Dr. Lee in support of Response to Motion in Limine (1.00); edit both response and affidavit for consistency (.80); review and incorporate language from Barbanti pleading (1.00).	6.30	1,134.00
10/16/02	NKA	Continue to draft privilege log for Alan Stringer material in WRG 10 million series (4.80); Manage and provide assistance to temporary employees and HRO personnel re document review/coding issues (1.50).	6.30	693.00

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Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/16/02	AEC	Review and transmit supplemental production documents for potential use by our experts (3.3); review, categorize and code documents produced by EPA for relevance to various case issues (1.8); update deposition exhibit tracking chart and notebooks, and update database to reflect previously marked exhibits (1.5).	6.60	825.00
10/16/02	AH	Review and organize W.R. Grace case file (N/C).	0.00	0.00
10/16/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (12.00).	12.00	1,500.00
10/16/02	JLS	Research re liability for Motion for Summary Judgment (4.30); database research re Libby timeline (0.90); conferences with KLKinnear re same (0.30); review categorize and code Boulder documents for various case issues (3.20).	8.70	1,087.50
10/16/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.80	528.00
10/16/02	MBF	Research for LSDecker regarding CERCLA section 9601(35)(A) and owner/operator liability (3.70); review, categorize and code documents to be produced to EPA (2.80).	5.50	495.00
10/16/02	ICM	Conduct research on several legal issues to develop motions in response to DOJ motions to exclude experts and summary judgment.	8.00	880.00
10/17/02	KWL	Telephone conference with KJCoggon re coordination of various trial preparation issues. (N/C)	0.00	0.00

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Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/17/02	CLN	Review and evaluate U.S. motions (2.0); conference with J. Flynn (.30); conference with H. Eschenbach and arrange for affidavit (.20); perform quality control check on documents (.80) (.80 N/C); finalize H. Eschenbach deposition memo and provide to D. Cameron (.20); review and revise findings of fact and conclusions of law (3.0).	5.70	1,710.00
10/17/02	LSD	Office conference with JAD'Alessandro re status of research (.30); respond to emails re strategies for additional scope of stipulation (.70); continue research and review of facts in preparation for responding to Motion for Summary Judgment on liability (2.80).	3.80	1,140.00
10/17/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (3.00).	3.00	825.00
10/17/02	KJC	Draft, review and edit findings of fact and conclusions of law (1.10); draft direct examination questions (0.40); review and respond to e-mail and questions re document review and coding (0.20); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.70); review and respond to e-mail and follow up on document production from EPA (0.20); respond to questions from client and team re facts and documents (0.30); telephone conference with R. Lee re direct exam testimony and exhibits (2.00); draft emails to client re Motion for Summary Judgments (0.40); telephone conference with W. Corcoran re stipulation, schedule and progress (0.10); telephone conference with KWLund re status of various case projects (0.40); review Motion for Summary Judgment re liability (0.30); telephone conference with EEStevenson re Daubert and Jensen revised schedule (0.30).	6.40	1,760.00